Trademark Trial and Appeal Board Electronic Filing System. http://estta.uspto.gov

ESTTA Tracking number: **ESTTA1096340**

Filing date: **11/18/2020**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91237315
Party	Plaintiff American Marriage Ministries
Correspondence Address	NANCY V STEPHENS FOSTER PEPPER PLLC 1111 3RD AVENUE SUITE 3000 SEATTLE, WA 98101 UNITED STATES Primary Email: nancy.stephens@foster.com 206-447-4400
Submission	Opposition/Response to Motion
Filer's Name	Nancy V. Stephens
Filer's email	nancy.stephens@foster.com
Signature	/Nancy V. Stephens/
Date	11/18/2020
Attachments	AMM Opposers Response to Applicants Motion.pdf(148691 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

AMERICAN MARRIAGE MINISTRIES, Opposer, v. UNIVERSAL LIFE CHURCH MONASTERY STOREHOUSE, INC. Applicant.	)	Opposition No. 91237315 **OPPOSER'S RESPONSE TO APPLICANT'S MOTION TO ORDER SERVICE OF DEPOSITIONS, EXTEND APPLICANT'S TRIAL PERIOD, AND STRIKE OPPOSER'S NOTICE OF RELIANCE**

I. INTRODUCTION

Applicant's combined motion to strike and motion for an extension is the latest in a series of efforts by Applicant to delay resolution of this proceeding and avoid the merits of the case. Instead of substantively responding to Opposer's evidence, Applicant tries to avoid the relevant evidence and issues through efforts to strike it. However, similar evidence is routinely considered by the Board in proceedings of this nature, and Opposer's evidence should be admitted.

Many of Applicant's objections to Opposer's exhibits are moot, and Applicant withdrew several of its other objections. Meanwhile, Applicant waived its procedural objection to Opposer's statements of relevance by failing to timely raise the objection, and that objection, even if it had been timely raised, lacks merit.

Additionally, Applicant's allegations of prejudice in receiving some deposition transcripts more than 30 days after the depositions were taken is belied by the following facts: Applicant attended the depositions in question; Applicant now has certified, corrected copies of

all of the deposition transcripts and exhibits; and the Parties agreed to a stipulated extension of Applicant's trial period.[1]

Accordingly, the Board should deny Applicant's motion in its entirety.

II. FACTUAL BACKGROUND

By stipulation of the Parties, Opposer's 30-day trial period ended on September 11, 2020. 38 TTABVUE 2. Prior to the expiration of this trial period, Opposer introduced evidence via six testimony depositions (subsequently filed at 48-51, 54-55 TTABVUE) and by the submission of exhibits attached to a notice of reliance (49-45 TTABVUE).

A. *Opposer's taking of testimony depositions and service of deposition transcripts*

During its trial period, Opposer took testimony depositions of six witnesses between September 4 and September 11, 2020. Applicant attended each of these depositions and participated in each through making live objections and conducting cross-examinations. Applicant received copies of the exhibits used at the deposition concurrent with the taking of the depositions, and in many cases, used these exhibits in the course of its cross-examinations of the witnesses. Declaration of Nancy Stephens ("Stephens Dec."), ¶ 2.

Though Opposer promptly ordered copies of the deposition transcripts from the court reporter, the transcripts were not available until after the close of its trial period. *Id.*, ¶ 3. Upon receiving copies of the deposition transcripts from the court reporter, Opposer immediately provided to Applicant the transcripts of the depositions of witnesses affiliated with Applicant (George Freeman, Dallas Goschie, and Brian Wozeniak) for review and correction. *Id.*, ¶ 4.

Opposer also immediately provided transcripts of the depositions of Opposer-affiliated witnesses (Dylan Wall, Lewis King, and Glen Yoshioka) to these individuals for review and

[1] The Parties could have easily resolved this issue without Board involvement had Applicant contacted Opposer before filing.

correction, as permitted by Federal Rule of Evidence 30(e)(1). *Id.* Opposer, mindful of its duty under Trademark Rule 2.125(c) to correct all typographical errors in deposition transcripts prior to filing the transcripts with the Board, held off on providing transcripts of these three depositions to Applicant and to the Board while it waited for the witnesses' corrections and signatures to ensure those transcripts were final and complete.

Opposer obtained timely corrections and signatures from Mr. King, Mr. Wall, and Mr. Yoshioka on November 2, 2020, and the same day, it provided Applicant with copies of the deposition transcripts, correction sheets, and exhibits for these three witnesses (though, as already stated, Applicant already had copies of the exhibits). *Id.*, ¶ 5. It subsequently received corrections and signatures from the Applicant-affiliated witnesses, Mr. Freeman, Mr. Goschie, and Mr. Wozeniak. Once it had the certified, corrected transcripts and exhibits ready from all witnesses, Opposer filed the transcripts with TTAB in accordance with Trademark Rule 2.125. *See* 47-52 TTABVUE (filed November 5, 2020); 54-55 TTABVUE (filed November 17, 2020); *see also* Stephens Dec., ¶ 7.

Applicant claims, in its motion, that in addition to receiving the unfinalized, uncorrected Freeman, Goschie, and Wozeniak transcripts on October 1, 2020, it should have also received the unfinalized, uncorrected versions of the Wall, Yoshioka, and King transcripts on or before October 12, 2020. *See* 46 TTABVUE 5. However, Applicant did not request copies of these transcripts at any point prior to bringing its October 29, 2020 motion requesting that the Board order service of copies of the transcripts. Stephens Dec., ¶ 8.

B. *Opposer's submission of exhibits via Notice of Reliance*

In addition to taking evidence through depositions, on September 9, 2020, Opposer introduced evidence into the record through the timely submission of a Notice of Reliance. 39

TTABVUE 2-11 and accompanying exhibits, *see* 39-43 TTABVUE. Due to a clerical error, certain pieces of evidence identified in the Notice of Reliance and served on Applicant were not correctly filed; this error was corrected on September 25, 2020, when pages which had been correctly served on Applicant but not submitted with the original filing were submitted to the Board in place of the mistakenly-filed pages. *See* 44-45 TTABVUE.

One of the exhibits identified in Opposer's Notice of Reliance is a "copy of Opposer's Motion for Partial Summary Judgment with Exhibits," identified in the Notice of Reliance as Exhibit I. 39 TTABVUE 5. A copy of this document was first submitted to the Board in this proceeding and served on Applicant over a year and a half ago, on February 28, 2019. 21 TTABVUE 1-93; *see also* 22 TTABVUE. In including this document in Opposer's September 9, 2020 Notice of Reliance, a clerical error resulted in an incorrect version of Exhibit I being filed and served on Applicant. Opposer subsequently corrected the filing with the Board, but inadvertently did not include the corrected exhibit among the documents served on Applicant on September 25, 2020. Opposer has since cured that mistake by re-serving a copy of the corrected Exhibit I (the same document Applicant received on February 28, 2019) on Applicant. Stephens Dec., ¶ 9. Opposer's service of this document should by now have confirmed for Applicant that the Exhibit I submitted with Opposer's Notice of Errata on its Notice of Reliance (at 45 TTABVUE 3, ¶ 5) is in fact the same document identified in Opposer's Notice of Reliance (at 39 TTABVUE 5, ¶ I). Applicant has had this document for over 20 months.

III. APPLICANT'S MOTION TO STRIKE OPPOSER'S NOTICE OF RELIANCE SHOULD BE DENIED.

A. Applicant Waived its Objection to Opposer's Statements of Relevance.

Applicant's objection to Opposer's statements of relevance in its Notice of Reliance is a procedural objection that could have been raised and cured earlier. By waiting until several

weeks into its testimony period before lodging the objection, Applicant waived this objection to the sufficiency of Opposer's identification of the relevance of Opposer's submitted materials.

If an adverse party believes that the propounding party has not met the requirement to "indicate generally the relevance of the material being offered," the adverse party "must lodge an objection *before the opening of the next testimony period* following that in which the material was offered into the record, or risk a finding that any objection on this basis has been waived." (Italics added.) *Apollo Med. Extrusion Techs., Inc. v. Med. Extrusion Techs., Inc.*, 123 U.S.P.Q.2d 1844 (T.T.A.B. 2017); *see also Bruce Kirby, Inc.*, No. 9205721, 2019 WL 585219, at *8 (T.T.A.B. Feb. 8, 2019) (nonprecedential opinion applying *Apollo Med. Extrusion Techs., Inc.* to find waiver of untimely objection to statements of relevance).

Applicant, however, waited more than seven weeks after Opposer filed its Notice of Reliance before lodging its objection to the sufficiency of Applicant's statements of relevance therein. Indeed, it saved this objection until a mere seven court days remained of Applicant's trial period (prior to the Parties' stipulated agreement to extend the trial period on other grounds). Applicant's failure to raise this objection before submitting its pretrial disclosures and before the opening of its 30-day trial period belie Applicant's assertion in its motion that it is not sufficiently apprised of the claims and issues in the case.

Additionally, Opposer's Notice of Reliance does identify for each exhibit the various issues to which the exhibit pertains, in keeping with the requirements of Trademark Rule 2.122(g). 39 TTABVUE 2-11. Though Applicant now belatedly seeks even greater specificity, Trademark Rule 2.122(g) does not require a party to exhaustively lay out its trial arguments in a Notice of Reliance; all that is required is an indication "generally" of the relevance of the evidence and an association with one or more of the issues in the case. As the Board recently

explained in a nonprecedential opinion, "Essentially, a notice of reliance is a cover sheet for evidence, notifying opposing parties that the offering party intends to rely on the material introduced thereunder. . . . A notice of reliance is not a vehicle to discuss the probative value of the evidence." *Allergan, Inc. v. Gems Style Inc.*, No. 91241842, 2020 WL 6581861, at *2 (T.T.A.B. Oct. 23, 2020).

Opposer's Notice of Reliance provides notice to Applicant that Opposer is presenting evidence relevant to issues of, *inter alia*, standing, the genericness or descriptiveness of the term "get ordained" as used by Applicant and by Opposer and by third parties, the relevant public's use and understanding of the term "get ordained," and the lack of exclusivity of use of the term. Applicant complains that Opposer identifies multiple issues for each of its exhibits, but this cannot be helped in a case where many of the claims and issues are overlapping, and much of the evidence therefore supports numerous claims and issues. There is nothing improper, and Applicant does not cite any case to support its position against, offering pieces of evidence for multiple issues.

Applicant further complains that Opposer's statement of relevance includes matters that Opposer believes to be unrelated to actual issues in this case. *See* 46 TTABVUE 8-9. Putting aside that Applicant is incorrect on this point, there is no prejudice to Applicant if Opposer undertook more work than it needed to and included allegedly irrelevant evidence. To the extent Applicant feels that identified matters are irrelevant, Applicant can decline to present evidence of its own about these topics, and the issue will be resolved in trial briefs at the proper time. Opposer, however, is entitled to present evidence on those topics it believes to be relevant.

In sum, Applicant's belated objection to Opposer's statements of relevance is without merit. Opposer provided Applicant with adequate notice of the claims and defenses it sees as

relevant to this proceeding. Had it not, Applicant should have raised its objections before filing its pretrial disclosures and before the start of its own trial period. In view of its failure to do so, Applicant's objection is waived.

B. Applicant's Overbroad Objections to Exhibits I, J, and K Do Not Support Striking these Entire Exhibits.

Applicant's objections to Opposer's Exhibits I-K are vastly overbroad. Exhibits I, J, and K consist of three sets of documents previously filed with the Board in this proceeding: (1) Opposer's Motion for Partial Summary Judgment and Exhibits (previously filed with the Board at 21 TTABVUE 1-93); (2) Opposer's Reply in Support of its Motion for Partial Summary Judgment (previously filed with the Board at 32 TTABVUE 1-13); and (3) the Declaration of Dylan Wall in Support of Opposer's Reply in Support of its Motion for Partial Summary Judgment (previously filed with the Board at 33 TTABVUE 1-152).

Two of these three exhibits (Exhibits I and K) contain documents previously submitted as evidence in support of Opposer's motion for partial summary judgment – evidence which the Board should reconsider now. Opposer therefore re-introduced these documents into evidence during its trial period, per Trademark Rule 2.122(c).

Anticipating (based on Applicant' prior objections in this proceeding) objections from Applicant on the grounds of completeness and/or surprise, Opposer introduced this evidence in the complete form previously submitted to the Board – i.e., with accompanying briefs and/or declarations, as applicable. Opposer acknowledges that briefs are not evidence, and it does not intend to rely on the briefs contained within Exhibits I and J as evidence, a fact Opposer made clear to Applicant once Applicant contacted Opposer *after* filing its motion. Opposer does, however, intend to rely on the evidence submitted with the briefs, and Applicant fails to put forth argument as to why this *evidence* should be excluded. Indeed, Applicant does not, in its motion,

raise any evidentiary objection to specific pieces of evidence within Exhibits I or K, so Opposer – and the Board – are unable to respond to such objections at this time.[2]

Applicant misleadingly asserts that "much" of the evidence contained within Exhibits I, J, and K was previously stricken or disregarded by the Board in denying Opposer's Motion for Partial Summary Judgment. *See* 46 TTABVUE 11. However, Applicant overlooks all the evidence within these exhibits that it either never objected to or for which the Board already overruled Applicant's evidentiary objections. *See, e.g.*, 36 TTABVUE 5.

For these reasons, Applicant's motion to strike the entirety of Exhibits I, J, and K is considerably overbroad. The Board can and should consider any admissible and relevant evidence contained within these exhibits.

C. Applicant's Objections to Exhibits A, B, C, and U-Z Are Either Withdrawn or Moot.

Though Applicant moves the Board to strike Exhibit A (*see* 46 TTABVUE 12), Applicant presents no argument on why Exhibit A should be stricken. Moreover, this exhibit (the trademark record for the trademark application at issue) is automatically admissible per Trademark Rule 2.122(b)(1). Accordingly, the Board should disregard Applicant's undeveloped motion to strike Exhibit A.

The Board should further disregard Applicant's motion to strike Exhibits B and C, as Applicant has withdrawn the objections to these Exhibits stated in its motion. Stephens Dec., Ex. 1 (November 9, 2020 email from Mike Matesky).

[2] If it had raised specific objections, even the ones it previously made, Opposer would have had the opportunity to demonstrate that Opposer cured a number of Applicant's previous evidentiary objections through the testimony elicited at the recent depositions. Perhaps Applicant seeks to avoid the merits of specific objections and the proper process for raising them for just that reason: in reflection of the fact that many of its prior objections are no longer valid.

Finally, Applicant's objections to Exhibits U-Z listed on Opposer's Notice of Reliance are now moot, as Opposer has submitted to the Board certified copies of the testimony depositions, corrections sheets, and exhibits of each of Opposer's six trial witnesses. *See* 48-51, 54-55 TTABVUE. Applicant referenced these documents as Exhibits U-Z in its Notice of Reliance as placeholders while it awaited the certified, corrected versions of the deposition transcripts. Now that the transcripts are available and have been submitted to the Board under separate cover, neither the Parties nor the Board need consider Exhibits U-Z to Opposer's Notice of Reliance.

IV. APPLICANT'S MOTION TO ORDER SERVICE OF DEPOSITIONS IS MOOT.

Applicant's request for an order requiring service of Opposer's testimony deposition transcripts and exhibits is moot, as Opposer already served all of the transcripts and exhibits for each of its six testimony depositions on Applicant, and filed certified, corrected copies of the transcripts and exhibits with the Board. *See* 47-52, 54-55 TTABVUE.

V. APPLICANT'S MOTION FOR AN EXTENSION IS EXCESSIVE.

No further extension of Applicant's trial period is warranted. The Parties stipulated to a 28-day extension of Applicant's trial period to allow Applicant additional time to respond, if desired, to the contents of the three transcripts served after October 12, 2020. 53 TTABVUE 2. Any additional time requested by Applicant would be excessive, and would unduly delay these proceedings to Opposer's detriment.

Specifically, Applicant's requested extension of 60 additional trial days following issuance of the Board's order on Applicant's motion is grossly excessive. Where a party fails to provide transcripts within 30 days, the adverse party may move to reset the adverse party's testimony period "as may be appropriate." 37 C.F.R. § 2.125(b). Here, Applicant received three of the six transcripts within the 30-day period set by Trademark Rule 2.125(b) and three of the

transcripts between 21 and 28 days after that 30-day period, yet it requests an additional 60 days from whenever the Board issues an order on its motion (a yet-to-be-determined date in the future). Such an indeterminate and lengthy extension is not "appropriate." To the contrary, it would confer an unwarranted advantage on Applicant by allowing Applicant many weeks or even months of additional time to respond to the testimony at depositions Applicant attended. Any conceivable prejudice to Applicant from not having all the transcripts in hand by October 12, 2020, has been cured by Opposer's agreement, following production of the certified corrected transcripts, to allow a 28-day extension of Applicant's trial period.

Similarly, no further extension is warranted to permit Applicant to address its requested modifications to the contents of Opposer's Notice of Reliance and accompanying exhibits. Applicant may not agree with the evidentiary value of Opposer's submitted materials, but the trial schedule set by the Board requires parties to proceed with introducing their own evidence even in the face of unresolved objections to their opponent's evidence. Applicant is on notice of the evidence Opposer offered in support of Opposer's case, and Applicant cannot be permitted to indefinitely delay its response. Differences of opinion about the relevance and admissibility of submitted evidence will be resolved in due course under the current trial schedule, through trial briefs and objections raised within the trial briefs, in accordance with the Board's standard procedure.

VI. CONCLUSION

For the foregoing reasons, Opposer respectfully requests that the Board: (1) deny Applicant's objection to Opposer's statements of relevance due to waiver; (2) deny Applicant's objections to Exhibits A, B, C, I-K, and U-Z to Opposer's Notice of Reliance as moot, withdrawn, or substantially overbroad; (3) deny as moot Applicant's motion to order service of

depositions; and (4) deny Applicant's motion for an extension of its trial period, in light of the stipulated extension already granted to Applicant by Opposer.

Dated: November 18, 2020

/Nancy V. Stephens/
Nancy V. Stephens WSBA No. 31510
Benjamin Hodges, WSBA No. 49301
Kelly A. Mennemeier WSBA No. 51838
Foster Garvey PC
Attorneys for Opposer
1111 Third Avenue, Suite 3200
Seattle, WA 98101-3299
206-447-4400

CERTIFICATE OF SERVICE

I hereby certify that on November 18, 2020, I served the foregoing Opposer's Response to Applicant's Motion for an Extension and to Strike by emailing to Applicant as follows:

Michael P. Matesky, II
Matesky Law PLLC
trademarks@mateskylaw.com mike@mateskylaw.com

/Nancy V. Stephens/
Nancy V. Stephens

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

AMERICAN MARRIAGE MINISTRIES, Opposer, v. UNIVERSAL LIFE CHURCH MONASTERY STOREHOUSE, INC. Applicant.	)	Opposition No. 91237315 **DECLARATION OF NANCY V. STEPHENS IN SUPPORT OF OPPOSER'S RESPONSE TO APPLICANT'S MOTION TO ORDER SERVICE OF DEPOSITIONS, EXTEND APPLICANT'S TRIAL PERIOD, AND STRIKE OPPOSER'S NOTICE OF RELIANCE**

I, Nancy V. Stephens, hereby declare and affirm as follows:

1. I am an attorney at Foster Garvey PC and one of the attorneys representing the Opposer, American Marriage Ministries ("AMM"), in this matter. I have personal knowledge of the facts stated herein and am otherwise competent to make this declaration.

2. Between September 4 and September 11, 2020, my co-counsel, Kelly Mennemeier, took testimony depositions of six trial witnesses: Dylan Wall, Lewis King, Glen Yoshioka, Brian Wozeniak, George Freeman, and Dallas Goschie. Counsel for Applicant in this matter, Mike Matesky, attended each of the six depositions and participated in each deposition through making live objections and conducting cross-examinations. Copies of the exhibits used at the depositions were made available to Mr. Matesky before or at the depositions, and in many cases, Mr. Matesky used the exhibits in the course of his cross-examinations of the witnesses.

3. I promptly arranged for copies of the deposition transcripts to be ordered from the court reporter, but the transcripts were not available until after the close of AMM's trial period.

4. Upon receiving copies of the deposition transcripts from the court reporter, I immediately provided Mr. Matesky with copies the transcripts of the depositions of George Freeman, Dallas Goschie, and Brian Wozeniak for review and correction. I also immediately provided transcripts of the depositions of Dylan Wall, Lewis King, and Glen Yoshioka to these individuals for review and correction.

5. I obtained signed, notarized correction sheets from Mr. King, Mr. Wall, and Mr. Yoshioka on November 2, 2020. That same day, I sent copies of their deposition transcripts, correction sheets, and exhibits to Mr. Matesky.

6. I received signed, notarized correction sheets from Mr. Matesky on November 2, 2020, for Mr. Freeman's and Mr. Goschie's depositions. I received a signed, notarized correction sheet from Mr. Matesky on November 3, 2020 for Mr. Wozeniak's deposition.

7. On November 5, 2020, I arranged to file the certified, corrected deposition transcripts and accompanying exhibits with TTAB. I later discovered that complete copies of the depositions, correction sheets, and exhibits for Lewis King and Dallas Goschie did not populate on the TTAB website, so on November 17, 2020, I re-filed these documents to ensure that the Board had complete, certified corrected transcripts and exhibits in the record. I served complete copies of the transcripts, correction sheets, and exhibits on Mr. Matesky on November 5, 2020, and re-served complete copies of the transcripts, correction sheets, and exhibits for Mr. King and Mr. Goschie on Mr. Matesky on November 17, 2020.

8. Prior to filing Applicant's October 29, 2020 motion, Mr. Matesky did not contact me to request copies of the deposition transcripts for Mr. Wall, Mr. King, or Mr. Yoshioka.

9. One of the exhibits identified in AMM's Notice of Reliance is a "copy of Opposer's Motion for Partial Summary Judgment with Exhibits," identified in the Notice of

Reliance as Exhibit I. In including this document in Opposer's September 9, 2020 Notice of Reliance, a clerical error resulted in an incorrect version of Exhibit I being filed and served on Applicant. I subsequently corrected the filing with the Board on September 25, 2020, but a copy of the corrected Exhibit I inadvertently was not included among the documents served on Mr. Matesky on September 25, 2020. On November 17, 2020, I arranged for a new copy of the corrected Exhibit I to be served on Applicant. Exhibit I consists of AMM's previously filed Motion for Partial Summary Judgment and its accompanying exhibits, which was previously filed and served on Applicant on February 28, 2019.

10. Attached to this declaration as **Exhibit 1** is a true and correct copy of a November 9, 2020 email from Mr. Matesky, by which he withdraws Applicant's objections to Exhibit B and C stated in Applicant's motion.

I certify under penalty of perjury under the laws of the United Stated that the foregoing is true and correct.

Executed this 18th day of November 2020 at Seattle, Washington.

/Nancy V. Stephens/
Nancy V. Stephens

CERTIFICATE OF SERVICE

I hereby certify that on November 18, 2020, I served the foregoing Declaration of Nancy Stephens by emailing to Applicant as follows:

Michael P. Matesky, II
Matesky Law PLLC
trademarks@mateskylaw.com mike@mateskylaw.com

/Nancy V. Stephens/
Nancy V. Stephens

From:	Mike Matesky
To:	Nancy Stephens; Ben Hodges; Kelly Mennemeier
Cc:	Michael Galletch
Subject:	GET ORDAINED -- Stipulation re Schedule
Date:	Monday, November 09, 2020 11:31:13 AM
Attachments:	Stip. Mot. Ext. Trial 110920.doc

Dear Counsel,

In follow-up to the conversation with Ben and Kelly on Friday, this email is to confirm that ULC Monastery will stipulate to a 28-day extension of its trial period, without prejudice to ULC Monastery's pending request that it be granted an extension until after submission of any amended Notice of Reliance or exhibits from AMM. I have attached a draft Stipulated Motion to Extend setting forth this stipulation. Please let me know as soon as possible whether the attached stipulated motion is acceptable to file with your signature.

ULC Monastery also withdraws the objections stated in its pending motion to Exhibits B and C to AMM's Notice of Reliance. For clarity, this should not be taken as a waiver of other potential objections (e.g., hearsay) to such documents.

Sincerely,

Mike

Mike Matesky
Matesky Law PLLC
4500 9th Ave. NE, Suite 300
Seattle, WA 98105
(Please Note New Street/Mailing Address Above)
Ph: 206.701.0331
Fax: 206.701.0332
mike@mateskylaw.com
www.mateskylaw.com

matesky_logo (400x94)